

  
LAFFPC.CV.62824693

Requested by Atty.: DUPRE, ANTHONY

## CITATION

LEONARD SCELFO

15TH JUDICIAL DISTRICT COURT

VS

DOCKET NUMBER: C-20213598 B

EXPEDITORS AND PRODUCTION  
SERVICES CO

PARISH OF LAFAYETTE, LOUISIANA

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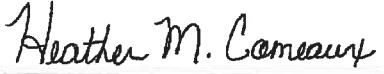
### STATE OF LOUISIANA

TO: EXPEDITORS AND PRODUCTION SERVICES COMPANY  
THROUGH THEIR AGENT FOR SERVICE  
TODD MATTE  
425 INDUSTRIAL PKWY  
LAFAYETTE, LA

of the Parish of Lafayette

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). You should file an answer or other pleading to said petition in the office of the Clerk of the 15<sup>th</sup> Judicial District Court in the Lafayette Parish Courthouse, Lafayette, Louisiana, within fifteen (15) days after the service hereof. Alternatively, your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

WITNESS THE HONORABLE JUDGES OF SAID COURT, this JULY 12, 2021.



Deputy Clerk of Court  
Lafayette Parish

\*Additionally, you are hereby served with the following attached documents and ordered to comply with same:  
PETITION, WRITTEN INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

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SHERIFF'S RETURN  
LAFAYETTE PARISH SHERIFF

DATE SERVED: \_\_\_\_\_ 20\_\_\_\_\_ TIME: \_\_\_\_\_

SERVED: \_\_\_\_\_

PERSONAL ( ) \_\_\_\_\_

DOMICILIARY ( ) ON \_\_\_\_\_

UNABLE TO LOCATE MOVED ( ) NO SUCH ADDRESS ( )

OTHER REASON: \_\_\_\_\_

RECEIVED TOO LATE FOR SERVICE ( )

SERVICE OF WITHIN PAPERS

COSTS FEE \$ \_\_\_\_\_ MILEAGE \$ \_\_\_\_\_ TOTAL \$ \_\_\_\_\_

DEPUTY \_\_\_\_\_



Lafayette Parish Filed Jul 12, 2021 11:12 AM Martina Reaux Deputy Clerk of Court	C-20213598 B
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LEONARD SCELFO

CIVIL DOCKET NO: C-20213598

VERSUS

15<sup>TH</sup> JUDICIAL DISTRICT COURT

EXPEDITORS AND PRODUCTION  
SERVICES COMPANY

LAFAYETTE PARISH, LOUISIANA

---

PETITION FOR RECOVERY OF OVERTIME WAGES,  
LIQUIDATED DAMAGES AND ATTORNEY FEES

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The petition of **LEONARD SCELFO**, a competent major resident of and domiciled in Evangeline Parish, Louisiana, who, with respect, represents:

1.

Made defendant herein is **EXPEDITORS AND PRODUCTION SERVICES COMPANY**, a Louisiana Corporation, in good standing with the Secretary of State, domiciled in Lafayette Parish, Louisiana.

2.

At all material times herein, **LEONARD SCELFO**, was an employee of defendant, hereinafter referred to as "**EXPEDITORS AND PRODUCTION SERVICES COMPANY**".

3.

Between January 8, 2020 and January 6, 2021, petitioner, **LENORD SCELFO**, was a regular, full-time employee of **EXPEDITORS AND PRODUCTION SERVICES COMPANY**.

4.

During the time period set out in paragraph 3 above, petitioner worked substantial overtime with **EXPEDITORS AND PRODUCTION SERVICES COMPANY** for which he was not properly compensated, that is, at the rate of one and one-half times his regular pay.

5.

In an effort to escape paying overtime to **LEONARD SCELFO** and others, defendant listed the overtime worked by Plaintiff and other employees as after 12 hours of work per day instead of after eight hours per day.

6.

Defendant's failure to compensate plaintiff at the proper "overtime" rate constitutes a violation of L.A. R.S. 23:631 and the Federal "Fair Labor Standards Act".

7.

This violation of the defendant entitles petitioner to his full overtime wages, liquidated



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Lafayette Parish  
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damages equal to the amount of overtime wages owed to petitioner and attorney's fees incurred in the prosecution of this action.

**WHEREFORE**, plaintiff prays that:

- 1) The defendant, **EXPEDITORS AND PRODUCTION SERVICES COMPANY**, be duly cited and served with a copy of this petition;
- 2) After all legal delays and due proceedings had, that there be judgment herein in favor of plaintiff, **LEONARD SCELFO** as follows:
  - A. For all overtime wages wrongfully withheld from him;
  - B. For liquidated damages in an amount equal to the withheld overtime pay;
  - C. For attorney's fees incurred in the prosecution of this action; and
  - D. For all costs of these proceedings.

**RESPECTFULLY SUBMITTED:**

BY: 

ANTHONY C. DUPRE' (#1342)  
ATTORNEY AT LAW  
514 WEST MAIN STREET  
POST OFFICE DRAWER F  
VILLE PLATTE, LA 70586  
(337) 363-3804

**PLEASE SERVE:**

**EXPEDITORS AND PRODUCTION  
SERVICES COMPANY**

Through their Agent for service

**TODD MATTE  
425 INDUSTRIAL PKWY  
LAFAYETTE, LA.**



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LEONARD SCELFO

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EXPEDITORS AND PRODUCTION  
SERVICES COMPANY

LAFAYETTE PARISH, LOUISIANA

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WRITTEN INTERROGATORIES AND  
REQUEST FOR PRODUCTION OF DOCUMENTS

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TO:

EXPEDITORS AND PRODUCTION  
SERVICES COMPANY

NOW INTO COURT, through undersigned counsel, comes the plaintiff, who propounds the following written Interrogatories upon the defendant(s), which said Interrogatories and Request for Production of Documents are to be answered fully, completely, in writing and under oath within the delays provided by the Louisiana Code of Civil Procedure and (which are to be deemed continuing) and answered if and when the information comes within the knowledge and\or possession of the defendants:

**A. DEFINITIONS AND INSTRUCTIONS**

- (1) "Person" or "Persons" means natural person, corporations, partnerships, sole proprietorships, unions, associations, federations or any other kind of entity.
- (2) When used with respect to an individual, the words "identify" or "describe" mean to state with respect to such individual:
  - a) His or her name;
  - b) His or her last known home address and telephone number;
  - c) His or her business address and telephone number;
- (3) When used with respect to a business or organization, the words "identify" or "describe" mean to state its full business name, nature of the organization (ex. corporation, partnership, joint venture, etc.), its place of incorporation, its principal place of business, and its present or last known mailing address, if different.
- (4) "Document" means any printed, typewritten, handwritten or otherwise recorded matter of whatever character, including, but not limited to, letters purchase orders, memoranda, telegrams, notes, catalogs, brochures, diaries, reports, calendars, interoffice communications, statements, announcements, photographs, tape recordings, motion pictures and any carbon or photostatic copies of any such material if you do not have custody or control of the original.
- (5) When used with respect to any documents, the words "identify" or "describe" mean to state the type of document, the author and addressee, their business affiliation and titles, the date and form of the document, the present location and custodian of



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the document and a description of its content.

- (6) When used with respect to oral communications, the words "identify" or "describe" mean to state exactly what was said, where it was said, when it was said, by whom and to whom it was said, including the names of each person present.
- (7) When used with respect to a meeting, conference, conversation or discussion the words "identify" or "describe" mean to state its place, the date, the individuals present, including business affiliations and positions, the subject matter discussed, whether any documents describing or referring to such a meeting exist, and identifying date relative to such documents.
- (8) Whenever the words "the Accident" are used, they refer to the accident which is the basis of this lawsuit.
- (9) Whenever the words "you" or "your" are used in these interrogatories, they refer to the defendants.

If you object to any interrogatory propounded or request for documents on the ground that its requests information that falls within the attorney/client privilege or is protected by the work product doctrine or for any other reasons, please provide the following information as to each objection.

- (a) The nature of the privilege or doctrine you claim is applicable and the reason you invoke it;
- (b) If a document is involved, identify the document (as described above) and identify each and every person known by you to have seen the document; and
- (c) If an oral communication is involved, identify the communication (as described above) and identify each and every person known by you to whom the substance of the communication has been disclosed.

**INTERROGATORY NUMBER 1:**

Please identify the person(s) answering these interrogatories including, without limitation, the person(s) who furnished you with any information whatsoever or with whom you consulted in drafting your answers to these interrogatories.

**INTERROGATORY NUMBER 2:**

Please list the names, addresses, telephone numbers of anyone having knowledge of relevant facts.

**REQUEST FOR PRODUCTION NUMBER 1:**

Please produce all payroll records of **LEONARD SCELFO** regarding his employment with **EXPEDITORS AND PRODUCTION SERVICES COMPANY**, including but not limited to:

- a. Time sheets of **LEONARD SCELFO** ;
- b. "Sign-in" and "Sign-out" sheets of **LEONARD SCELFO** ;



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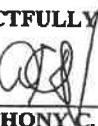
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- c. All Checks written to **LEONARD SCELFO**; and
- d. The complete "Personal File" of **LEONARD SCELFO** in possession of  
**EXPEDITORS AND PRODUCTION SERVICES COMPANY.**

RESPECTFULLY SUBMITTED:

BY:

  
ANTHONY C. DUPRE' (#1342)  
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